

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION**

RYAN, LLC,

Plaintiffs,

VS.

SEAN RADIN,

Defendant.

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CIVIL ACTION NO. 1:24-cv-108-H

DEFENDANT’S SEAN RADIN’S MOTION TO TRANSFER DIVISION

Defendant Sean Radin (hereinafter “Radin” or “Defendant”), moves this court to enter an Order transferring this case to the Northern District of Texas, Dallas Division, and in support thereof, respectfully shows the Court the following:

Defendant filed its Notice of Removal on Thursday, July 11, 2024, and inadvertently chose the “Abilene Division” instead of the “Dallas Division” when completing the electronic filing form.

Venue is proper in the Dallas Division as Plaintiff’s Original Petition was filed in Dallas County, Texas and under 28 U.S.C. § 1441(a), venue of the removed action is proper in the Dallas Division because the Northern District of Texas, Dallas Division is the district and division embracing the place where the state court action is pending.

WHEREFORE, Defendant Sean Radin respectfully requests this action be transferred from the Northern District of Texas, Abilene Division to the Northern District of Texas, Dallas Division.

Respectfully submitted,

/s/ Kimberly S. Moore

KIMBERLY S. MOORE

State Bar No. 00784629

ksmoore@clarkhill.com

LAURA E. CALHOUN

State Bar No. 06342400

lcalhoun@clarkhill.com

CLARK HILL PLC

2600 Dallas Parkway

Suite 600

Frisco, Texas 75034

469.287.3900

469.287.3999 Fax

ATTORNEYS FOR DEFENDANT

SEAN RADIN

CERTIFICATE OF CONFERENCE

Counsel for Defendant, Laura Calhoun, conferred with counsel for Plaintiff, Andrew Turner, on July 11, 2024 regarding this Motion to Transfer Division. Counsel for Plaintiff is not opposed to the Motion.

/s/ Laura E. Calhoun

Laura E. Calhoun

CERTIFICATE OF SERVICE

I hereby certify that on this, the 11th day of July, 2024, a true and correct copy of the foregoing was filed utilizing the Court's ECF system and all parties of record were notified via the Court's ECF system.

/s/ Kimberly S. Moore

KIMBERLY S. MOORE